

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

FEB -1 2017

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN BARTLETT,

Defendant.

4:17CR050 CEJ/NAB

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:

- (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));
- (b) "sexually explicit conduct" to mean actual or simulated
  - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,
  - (ii) bestiality,
  - (iii) masturbation,
  - (iv) sadistic or masochistic abuse, or
  - (v) lascivious exhibition of the genitals or pubic area of any person (18

U.S.C. §2256(2)(A)); and

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about January 1, 2014 and on or about May 24, 2016, in the Eastern District of Missouri, and elsewhere,

**STEPHEN BARTLETT,**

the Defendant herein, did knowingly use a minor, L.H., to engage in sexually explicit conduct, specifically, Stephen Bartlett produced a graphic video where he places the hand of L.H. onto his

penis, and said sexually explicit conduct was for the purpose of producing a visual depiction of such conduct, to wit: a video of minor child L.H.'s hand on the defendant's penis, and such depiction was produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., PNY Optima 2GB SD Card.

In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

## **COUNT II**

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.
3. Between on or about January 1, 2014 and on or about May 24, 2016, in the Eastern District of Missouri, and elsewhere,

### **STEPHEN BARTLETT,**

the Defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor, L.H., to engage in sexually explicit conduct, specifically, Stephen Bartlett produced images of L.H. in a lascivious display of her genitals, and said sexually explicit conduct was for the purpose of producing a visual depiction of such conduct, to wit: images of L.H. in a lascivious display of her genitals, and such depictions were produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce, i.e., Kodak 2GB SD card.

In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18,

United States Code, Section 2251(e).

**COUNT III**

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.
3. Between on or about January 1, 2014 and on or about May 24, 2016, in the Eastern District of Missouri, and elsewhere,

**STEPHEN BARTLETT,**

the Defendant herein, did knowingly use a minor, L.H., to engage in sexually explicit conduct, specifically, Stephen Bartlett produced a graphic image where he places the hand of L.H. onto his penis, and said sexually explicit conduct was for the purpose of producing a visual depiction of such conduct, to wit: an image of minor child L.H.'s hand on the defendant's penis, and such depiction was produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce,, i.e., HP 15-f009wm Laptop hard drive.

In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18,  
United States Code, Section 2251(e).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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